Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
CITY OF HAMMOND
RONALD L. NOVAK
Director

June 22, 2005

Certified Mail # 9059 7257

Roger Mentz
Plant Manager
Silgan Containers Manufacturing Corporation
2501 – 165th Street
Hammond, IN 46320

Re: 089-19655
Minor Permit Modification to
Part 70 No.: T089-6900-00202

Dear Mr. Mentz:

Silgan Containers Manufacturing Corporation was issued a permit on February 5, 2001 for a Metal Coil Coating Operation. A letter requesting changes to this permit was received on September 22, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of limitations for the hazardous air pollutant emissions from the Silgan facility in Hammond. These limitations along with the corresponding record keeping and reporting requirements were added at your request for the purpose of opting out of the requirements of the MACT standards in 40 CFR 63, Subpart SSSS for metal coil coating facilities.

All other conditions of the permit shall remain unchanged and in effect. Due to the addition of a reporting form and the re-pagination of the permit, a complete modified permit is being issued. The expiration date of the original permit has not changed. The actual affected pages are noted on the new title page.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (219) 853-6306 and ask for Ronald Holder.

Sincerely,

Original Signed By

Ronald L. Novak, Director
Hammond Department of Environmental Management
Air Pollution Control Division

Attachments

cc: Mindy Hahn, IDEM-OAQ, Permits Administration

5925 Calumet Avenue
Hammond, IN 46320
219. 853.6306
fax: 219 853 6343

Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
CITY OF HAMMOND
RONALD L. NOVAK
Director

# PART 70 OPERATING PERMIT

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
## OFFICE OF AIR QUALITY

**and**

## HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## Silgan Containers Manufacturing Corporation
## 2501 – 165th Street
## Hammond, Indiana 46320

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---|
| Operation Permit No.: **T089-6900-00202** | |
| Original<br>Signed by: Janet G. McCabe, Assistant Commissioner<br>Office of Air Quality | Issuance Date: February 5, 2001 |
| Original<br>Signed by: Ronald L. Novak, Director<br>Hammond Department of Environmental Management | Expiration Date: February 5, 2006 |

Administrative Amendment No.: 089-19540-00202 Issuance Date: July 2, 2004

| | |
|---|---|
| Minor Permit Modification No.: **089-19655-00202** | Pages Affected: 1, 3, 4, 29-33, and 44 |
| Issued by: Original Signed By<br>Ronald L. Novak, Director<br>Hammond Department of Environmental Management | Issuance Date: June 22, 2005 |

5925 Calumet Avenue
Hammond. IN 46320
**219. 853.6306**
fax: 219 853 6343

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management-Office of Air Quality (IDEM-OAQ) and the Hammond Department of Environmental Management (HDEM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary, metal coil coating for can manufacturers operation, that coats steel and aluminum coils.

| | |
|---|---|
| Responsible Official: | Roger Mentz, Plant Manager |
| Source Address: | 2501 – 165th Street, Hammond, Indiana 46320 |
| Mailing Address: | (same) |
| SIC Code: | 3479 & 3411 - Metal Coil Coating for Can Manufacturers, Coated Steel and Aluminum Coils |
| County Location: | Lake |
| Source Location Status: | Attainment/Unclassifiable for CO, $NO_2$ and Lead,<br>Primary Nonattainment for SO2,<br>Moderate Nonattainment for PM10, and<br>Severe Nonattainment for Ozone. |
| Source Status: | Part 70 Permit Program<br>Major Source, under Emission Offset Rules;<br>Major Source, Section 112 of the Clean Air Act<br>Not 1 of 28 source categories listed under 326 IAC 2-2 |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) Coil Coating Line, identified as Oven and Oxidizer 1, constructed in 1957, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 20 MMBtu/hr, respectively (total combined capacity 64 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) fume incinerator which exhausts to stacks, identified as OX 1 and OX 3. This line also includes ten (10) mixing tanks, identified as MT 1 – MT 10, constructed in 1984, each with a maximum capacity of 290 gallons.

(b) Three (3) Rapid Engineering Spaceheaters, identified as AMU 1, AMU 2, and AMU 3, constructed in 1996, each rated at 9.65 MMBtu/hr and natural gas-fired only.

(c) Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks, identified as Tanks 1 – 7, Tanks 1 – 5 each with a maximum capacity of 12,000 gallons, constructed in 1970, and Tanks 6 & 7 each with a maximum capacity of 10,000 gallons, constructed in 1995, venting to TV 1 – TV 7. These seven tanks are used to store various solvents and coatings.

(d) Two (2) Dock Heaters No. 1 and No. 2, identified as Dock 1 and Dock 2, constructed in 1969, each rated at 0.75 MMBtu/hr and natural gas-fired only.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Space heaters, process heaters, or boilers using the following fuels.
(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(4) Paved and unpaved roads and parking lots with public access.

(5) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(6) Emergency generators as follows:
Diesel generators not exceeding 1600 horsepower.

(7) Grinding and machining operations combined with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(8) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(9) Other categories with emissions below insignificant thresholds not specifically regulated:
(a) One (1) Roll Grinder emitting less than one (1) lb/day of particulate.
(b) One (1) Emergency Diesel Generator emitting less than 1 lb/day of products of combustion.
(c) One (1) Gasoline Generator/Welder emitting less than 1 lb/day of products of combustion.
(d) One (1) Roll Lathe with Dust Collector emitting less than 1 lb/day of particulate.
(e) One (1) Radial Arm Saw with Cyclone and Bag Filter emitting less than 1 lb/day of particulate.
(f) Two (2) 50 Gallon Closed Top Degreasers emitting less than 1 lb/day of volatile organic compounds.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statues or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM-OAQ and HDEM, within a reasonable time, any information that IDEM-OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM-OAQ and HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)C]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period

from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than **April 15th** of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM-OAQ and HDEM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within **ninety (90) days** after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM-OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM-OAQ and HDEM. IDEM-OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM-OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),
or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

HDEM
Telephone Number: 219-853-6306
Facsimile Number: 219-853-6343

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM-OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM-OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance,

IDEM-OAQ or HDEM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM-OAQ or HDEM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM-OAQ or HDEM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM-OAQ or HDEM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM-OAQ or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM-OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM-

OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM-OAQ and HDEM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(2) If IDEM-OAQ or HDEM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM-OAQ and HDEM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM-OAQ and HDEM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM-OAQ and HDEM fail to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM-OAQ and HDEM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM-OAQ, HDEM, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM-OAQ, HDEM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, any records that must be kept under the conditions of this permit;

(c) Inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM-OAQ and HDEM within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM-OAQ and HDEM the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25)

tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM-OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM-OAQ and HDEM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM-OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM-OAQ and HDEM, if the source submits to IDEM-OAQ and HDEM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( ±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be

no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM-OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 9, 2001.

(b) If the ERP is disapproved by IDEM-OAQ or HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) Upon direct notification by IDEM-OAQ or HDEM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM-OAQ and HDEM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are;

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM-OAQ and HDEM upon request and shall be subject to review and approval by IDEM-OAQ and HDEM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered

a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM-OAQ and HDEM within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM-OAQ and HDEM that retesting in one-hundred and twenty (120) days is not practicable, IDEM-OAQ and HDEM may extend the retesting deadline.

(c) IDEM-OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM-OAQ and HDEM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] One (1) Coil Coating Line, identified as Oven and Oxidizer 1, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 20 MMBtu/hr, respectively (total combined capacity 64 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) fume incinerator which exhausts to stacks, identified as OX 1 and OX 3. This line also includes ten (10) mixing tanks, identified as MT 1 – MT 10, each with a maximum capacity of 290 gallons.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Particulate Matter less than 10 microns (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from the Coil Coater shall be limited to 0.007 lbs/MMBtu and 0.290 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

D.1.2 Particulate Matter less than 10 microns (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from the Stacks serving the incinerator shall be limited to 0.007 lbs/MMBtu and 0.310 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

D.1.3 Sulfur Dioxide (SO2) emission limitations [326 IAC 7-4-1.1(b)(1)]

Pursuant to 326 IAC 7-4-1.1 (Lake County sulfur dioxide emission limitations), the SO2 emissions from the Coil Coating Oven and Incinerator shall be limited to 0.3 lbs/MMBtu as specifically listed in 326 IAC 7-4-1.1(b)(1).

D.1.4 Volatile Organic Compounds (VOCs) [326 IAC 8-2-4(b)] [326 IAC 8-1-2(b)] [326 IAC 8-7-3(3)]

Pursuant to 326 IAC 8-2-4(b) (Coil coating operations), the VOC emissions from the Coil Coating Line shall be limited to 2.6 pounds per gallon (excluding water) as specifically listed in 326 IAC 8-2-4(b).

Use of a non-compliant coating requires that compliance be determined according to RACT equivalency emission standards, expressed as pounds of VOC per gallon of coating solids, allowed under the applicable emission limitation contained in 326 IAC 8-1-2(b) (Compliance Methods). The equivalency emission limit is 4.02 pounds of VOC per gallon of coating solids as applied.

D.1.5 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties [326 IAC 8-7]

Pursuant to 326 IAC 8-7-2 (Applicability), coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Lake County shall be subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties).

D.1.6 National Emissions Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil [326 IAC 20-1] [40 CFR 63, Subpart SSSS]

a) The total input of any one (1) single hazardous air pollutant (HAP) for the Coil Coating Line shall be less than five hundred (500) tons per twelve (12) consecutive month period.

b) The total input of any combination of HAPs for the Coil Coating Line shall be less than one thousand two hundred fifty (1250) tons per twelve (12) consecutive month period.

c) The Fume Incinerator known as Oxidizer 1 shall maintain a minimum overall control efficiency of ninety-eight percent (98%) such that emissions of any single hazardous air pollutant (HAP) are limited to less than ten (10) tons per twelve (12) consecutive month period and the total emissions of all hazardous air pollutants (HAPs) are limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

These limitations will make 40 CFR 63, Subpart SSSS, not applicable.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 8-7-3(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. Testing shall be performed at the inlet and outlet of Oxidizer 1 to demonstrate the control and destruction efficiency necessary to achieve compliance with Condition D.1.6 and the RACT equivalency emission limit of 4.02 lbs of VOC/gallon of coating solids as applied. This test shall be repeated at least once every 5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

D.1.9 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2(b)] [326 IAC 8-7-3(3)]

Compliance with the VOC content and emission limitation contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-2(b) using formulation data supplied by the coating manufacturer.

Compliance with D.1.4 shall be determined using the following equations:

Lbs/VOC per gal of solids = (lbs VOC per gal less water)/(1 – lbs VOC per gal less water / coating density (lbs/gal) as applied)

The emission limit in 326 IAC 8-2-4 is 2.6 lbs VOC per gal less water. The standard coating density used in formulas in the can industry is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of Lbs VOC/gal solids is:

lbs/VOC per gal of solids = 2.6/(1 – 2.6/7.36) = 4.02 lbs VOC/ gal solids

The emissions from the Coil Coater with Oven are controlled by one (1) fume incinerator. The overall rated control efficiency is 98%. This control efficiency is used to find the compliant limit of a coating's VOC content per gallon of coating solids.

(1-Overall Control Efficiency) X = emission limit of 4.02 lbs VOC per gal of solids (as applied)

where X = compliant coating limit in lbs VOC per gal of solids

(1 – 0.98) X = 4.02

X = 201 lbs VOC per gal of coating solids (as applied)

*Coating Density (as applied)* = Coating Density (as supplied) + (Dilution Solvent Density X Dilution Ratio) / (1+ Dilution Ratio)

*lbs solids per gal of coating (as applied)* = Coating Density (as supplied) * [Weight % Solids (as supplied) / 100] / (1 + Dilution Ratio)

*Weight % Solids in coating (as applied)* = lbs solids per gal coating / Coating Density (as applied) X 100

*Weight % Solvent in coating (as applied)* = 100 – Weight % Solids (as applied)

*Volume % Solids in Coating (as applied)* = Vol % Solids (as supplied) / (1 + Dilution Ratio)

*lbs VOC/gal less water (as applied)* = Density (as applied) X [Weight % Solvent (as applied) / 100]

*lbs VOC/gal solids (as applied)* = lbs VOC/gal less water (as applied) / [Volume % Solids (as applied) / 100]

The lbs VOC per gal of solids "as applied" is then compared to the limit for coil coating, considering the overall control efficiency, 201 lbs VOC per gal of coating solids (as applied). If lbs VOC per gal of solids "as applied" is less than this value, the coating "as applied" is compliant. If it is larger than this value, the coating "as applied" is not compliant and should not be used.

D.1.10 VOC Emissions
Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each quarter based on the daily weighted average of all coatings applied for the three (3) month reporting period.

D.1.11 Fume Incinerator [326 IAC 2-7-6] [326 IAC 8-7-3(1)]

Pursuant to 326 IAC 2-7-6, the fume incinerator used for VOC control shall operate at all times when the Coil Coating Line is in operation. When operating, the fume incinerator shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance test required by Condition D.1.8 to maintain a minimum 98% destruction of the volatile organic compound (VOC) captured.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.12 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the fume incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.13 Visible Emissions Notations

(a) Daily visible emission notations of the incinerator stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.14 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.4.

Silgan Containers Manufacturing Corporation shall be required to document compliance with the applicable (VOC) emission limitation based on a daily weighted average of all coatings applied. These records shall include the following:

(1) Date of use

(2) Coating identification (inside and outside material)

(3) Process operating rate (GALS/MLFT for each coating)

(4) Coating usage (application rate in weight /area, total gallons of coating used, total gallons of solids used)

(5) Coating information (as supplied and as applied of the coating density, % by weight & volume of organic volatiles, % by weight & volume of solids, lbs-VOC/gal less water as applied, lbs-VOC/gal of solids, dilution solvent used, and the dilution solvent ratio)

(6) Control equipment efficiency

(7) VOC emissions calculations (total lbs-VOC before controls and total lbs-VOC after controls)

(8) VOC emissions allowable

Sample calculations must also be included for the above items.

(b) To document compliance with Condition D.1.4, the Permittee shall be required to keep monthly records of all cleaning solvents used and the weight of any solvents reclaimed, manifested, and sent off-site for disposal and recovery.

(c) To document compliance with Condition D.1.3, the Permittee shall be required to record and maintain the monthly fuel usage for the Coil Coating Line. These records shall be submitted upon request by either HDEM or IDEM.

(d) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. These records shall be complete and sufficient to establish compliance with the twelve (12) month rolling total single and combination HAP emission limits established in Condition D.1.6. These records shall include the following:

(1) The HAP content of each coating as applied;

(2) The amount of each coating used;

(3) The overall control efficiency of the fume incinerator (Oxidizer 1) as established during the most recent compliance stack test; and

(4) The 12-month rolling total of the input of each individual hazardous air pollutant and total of hazardous air pollutants.

(e) That the Permittee be required to submit to the Department a formal request to use any new coatings not previously applied for prior to use. This request must be submitted at least seven (7) days in advance of use. The Permittee shall ensure compliance with 326 IAC 8-2-4 by performing those calculations listed in Condition D.1.9 and providing the Department with an MSDS.

(f) That visible stack observations be made on a daily basis as either “normal” or “above normal”. Corrective actions must be taken upon observation of an “above normal” stack condition. The source shall be required to record this information in a log. This log shall be submitted upon request by HDEM or IDEM.

(g) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4, D.1.6, and D.1.14 shall be submitted to the address(es) listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Three (3) Rapid Engineering Spaceheaters, identified as AMU 1, AMU 2 and AMU 3, each rated at 9.65 MMBtu/hr. These units are natural gas-fired only.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compound (VOC), and Carbon Monoxide (CO)

That emissions from the combustion of natural gas are governed by the Hammond Air Quality Control Ordinance No. 3522 (as amended) for the following pollutants: Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compounds (VOC), and Carbon Monoxide (CO).

**Compliance Determination Requirements**

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM or HDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM or HDEM, compliance with the limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.2.3 Compliance Monitoring

There are no compliance monitoring requirements applicable to these facilities.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for these facilities.

## SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Seven (7) Indoor Vertical, Fixed-Roof Storage Tanks, identified as Tank 1 – 7, each with a maximum capacity of 12,000 gallons, venting to TV 1 – TV 7. These seven tanks are used to store various solvents and coatings.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Volatile Organic Compound (VOC)

There are no emission limitations applicable to this facility.

**Compliance Determination Requirements**

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM or HDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM or HDEM, compliance with the limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.3.3 Compliance Monitoring

There are no compliance monitoring requirements applicable to these facilities.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.3.4 Record Keeping and Reporting Requirements

To document compliance with 326 IAC 8-9-6(a), the owner or operator of each vessel subject to 326 IAC 8-9-6 shall keep all records required by subsection (b) for the life of the vessel. In accordance with 326 IAC 8-9-6(b), records of each vessel including the vessel identification number, dimensions, capacity, and a description of the emission control equipment shall be submitted to the address(es) listed in Section C – General Reporting Requirements, of this permit, upon request.

## SECTION D.4 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

Facility Description [326 IAC 2-7-5(15)] Two (2) Dock Heaters No. 1 and No. 2, identified as Dock 1 and Dock 2, each rated at 0.75 MMBtu/hr. These units are natural gas-fired only.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.4.1 Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compound (VOC), and Carbon Monoxide (CO)

That emissions from the combustion of natural gas are governed by the Hammond Air Quality Control Ordinance No. 3522 (as amended) for the following pollutants: Particulate Matter (PM), Sulfur Dioxide (SO2), Nitrogen Oxide (NOx), Volatile Organic Compounds (VOC), and Carbon Monoxide (CO).

**Compliance Determination Requirements**

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM or HDEM may require compliance testing at any specific time when necessary to determine if these facilities are in compliance. If testing is required by IDEM or HDEM, compliance with the (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.4.3 Compliance Monitoring

There are no compliance monitoring requirements applicable to these facilities.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.4.4 Record Keeping and Reporting Requirements

There are no record keeping and reporting requirements for these facilities.

## SECTION D.5 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

Facility Description [326 IAC 2-7-5(15)] Two (2) Closed Top Degreasers (one (1) 20 gallon capacity citrus-based, remotely stored and one (1) 55 gallon capacity solvent-based, not remotely stored). (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.5.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations existing as of January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.5.2 Volatile Organic Compounds (VOC)

Cold cleaner degreasers without remote solvent reservoirs:

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility existing as of July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility existing as of July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.5.3 Record Keeping Requirement

(a) To document compliance with Conditions D.5.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.5.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC and HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOC and HAP emitted for each compliance period.

(b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.5.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address***(es)*** listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION
# and
# HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Silgan Containers Manufacturing Corporation
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: T089-6900-00202

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

_ Annual Compliance Certification Letter

_ Test Result (specify)

_ Report (specify)

_ Notification (specify)

_ Affidavit (specify)

_ Other (specify)

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: |
| Printed Name: |
| Title/Position: |
| Date: |

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

**COMPLIANCE BRANCH**
**P.O. Box 6015**
**100 North Senate Avenue**
**Indianapolis, Indiana 46206-6015**
**Phone: 317-233-5674**
**Fax: 317-233-5967**

and

# HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**5925 Calumet Avenue**
**Hammond, Indiana 46320**
**Phone: 219-853-6306**
**Fax: 219-853-6343**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

Source Name: Silgan Containers Manufacturing Corporation
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: T089-6900-00202

**This form consists of 2 pages** **Page 1 of 2**

_ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice by mail or facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected:<br>Was the facility being properly operated at the time of the emergency/deviation? Y N<br>Describe:<br><br>Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

| |
|---|
| Form Completed by: |
| Title / Position: |
| Date: |
| Phone: |

A certification is not required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION
# and
# HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## PART 70 OPERATING PERMIT
## NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Silgan Containers Manufacturing Corporation
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: T089-6900-00202

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Report period
Beginning: _____
Ending: _____

| Boiler Affected | Alternate Fuel | Days burning alternate fuel From | To |
|---|---|---|---|

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: |
| Printed Name: |
| Title/Position: |
| Date: |

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

**and**

## HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## Hazardous Air Pollutants (HAPs) Compliance Monitoring Form

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Part 70 Permit No.: T089-6900-00202
Facility: Coil Coating Line and Oxidizer
Limit: **Total input of any single HAP less than 500 tons per twelve (12) consecutive month period and total input of any combination of HAPs less than 1250 tons per twelve (12) consecutive month period to be determined each month as a twelve (12) month rolling total. The Oxidizer shall have a minimum control efficiency of 98%.**

**Reporting Quarter: _____ Year: _____**

| Month | Single HAP Input This Month | Single HAP Input Previous 11 Months | Single HAP Input 12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

**Control Efficiency determined during most recent stack test_____ (98% or greater).**

| Month | Total HAPs Input This Month | Total HAPs Input Previous 11 Months | Total HAPs Input 12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

This form is optional. An equivalent form subject to approval by IDEM-OAQ or HDEM may be used.

_ No deviation occurred in this month.

_ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## and

## HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## PART 70 OPERATING PERMIT
## QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Silgan Containers Manufacturing Corporation
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Mailing Address: (same)
Part 70 Permit No.: T089-6900-00202

**Months: _____ to _____ Year: _____**

**Page 1 of 2**

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

_ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

_ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

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| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| |
|---|
| Form Completed By: |
| Title/Position: |
| Date: |
| Phone: |

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
## Office of Air Quality

**and**

## Hammond Department of Environmental Management
## Air Pollution Control Division

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

### Source Background and Description

| | |
|---|---|
| Source Name: | Silgan Containers Manufacturing Corporation |
| Source Location: | 2501 – 165th Street, Hammond, Indiana 46320 |
| County: | Lake |
| SIC Code: | 3411 & 3479 - Metal Coil Coating for Can Mfg. |
| Operation Permit No.: | T089-6900-00202 |
| Operation Permit Issuance Date: | February 5, 2001 |
| Minor Permit Modification | **089-19655-00202** |
| Permit Reviewer: | Ronald Holder |

The Office of Air Quality (OAQ) has reviewed an air permit application from Silgan Containers Manufacturing Corporation (Silgan) to add language to their existing Part 70 permit to limit the individual and combination of hazardous air pollutant (HAP) emissions to ten (10) tons per year and twenty-five (25) tons per year, respectively.

### History

On September 22, 2004, Silgan submitted an application to the OAQ requesting to limit their hazardous air pollutant (HAP) emissions. Silgan was issued a Part 70 permit on February 5, 2001. On May 9, 2002, Silgan submitted the Part 1 MACT application stating that they have an emission point belonging to an affected source category potentially subject to Section 112(j) [40 CFR 63.50], Surface Coating of Metal Coil, [40 CFR 63, Subpart SSSS]. On June 2, 2004, Sigan submitted the Initial Notification required under 40 CFR 63, Subpart A. Silgan has decided to opt out of this program because they are able to maintain HAP emissions under the 10/25 thresholds.

### Existing Approvals

The source was issued a Part 70 Operating Permit (T089-6900-00202) on February 5, 2001. The source has since received the following:

Administrative Amendment No.: 089-19540-00202, issued on July 2, 2004.

### Enforcement Issue

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that a Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 22, 2004. Additional information was received on October 27, 2004 and March 9th and 11th, 2005.

**Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (one (1) page). Material substitutions have been verified, approved, and the data sheets are on file at the HDEM.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | < 100 |
| PM-10 | < 100 |
| $SO_2$ | < 100 |
| VOC | **> 25** |
| CO | < 100 |
| $NO_x$ | > 25 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAPs | Potential To Emit (tons/year) |
|---|---|
| Xylene | < 10 |
| Ethylbenzene | < 5 |
| Glycol ethers | < 2 |
| Methyl Isobutyl Ketone | < 2 |
| Toluene | < 1 |
| Methyl Ethyl Ketone | < 1 |
| Isophorone | < 1 |
| Methanol | < 0.1 |
| Formaldehyde | < 0.1 |
| Cumene | < 0.1 |
| Naphthalene | < 0.1 |
| Benzene | < 0.1 |
| TOTAL | < 25 |

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) are equal to or greater than twenty-five (25) tons per year in Lake County (a severe non-attainment area). Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Justification for Modification**

This Part 70 Operating permit is being modified as a Minor Permit Modification, because, pursuant to 326 IAC 2-7-12(b)(1)(E), it is not a modification under any provision of Title 1 of the Clean Air Act (CAA). Silgan is requesting limitations of its hazardous air pollutants (HAP) in order to opt out of the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart SSSS, for Surface Coating of Metal Coil. Therefore, it was not necessary to add NESHAP language to the permit.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data. HAP emissions are from Company records for 8/1/03 to 7/31/04.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| PM | 0.39 |
| PM-10 | 0.39 |
| $SO_2$ | 0.03 |
| VOC | 12.32 |
| CO | 4.28 |
| $NO_x$ | 5.10 |
| | |
| HAP | Actual Emissions (tons/year) |
| Xylene | 9.94 |
| Ethylbenzene | 2.25 |
| Glycol ethers | 1.18 |
| Methyl Isobutyl Ketone | 0.79 |
| Toluene | 0.17 |
| Methyl Ethyl Ketone | 0.18 |
| Isophorone | 0.09 |
| Methanol | 0.02 |
| Formaldehyde | 0.02 |
| Cumene | 0.01 |
| Naphthalene | 0.01 |
| Benzene | 0.01 |
| Total HAP | 14.67 |

**County Attainment Status**

This source is located in Lake County. 40 CFR 81.315 – (Indiana)

| Pollutant | Status |
|---|---|
| PM-10 | Attainment |
| $SO_2$ | Primary Nonattainment |
| $NO_2$ | Unclassifiable/Attainment |
| 1-hour Ozone | Severe Nonattainment |
| 8-hour Ozone | Moderate Nonattainment |
| CO | Unclassifiable/Attainment |
| Lead | Attainment |

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review.

Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Lake County has been classified as nonattainment in Indiana for sulfur dioxide ($SO_2$). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(c) Lake County has been classified as attainment or unclassifiable in Indiana for particulates less than ten (10) microns in diameter ($PM_{10}$), oxides of nitrogen (NOx), carbon monoxide (CO), and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

There are no emissions increases due to this request to opt out of 40 CFR 63, Subpart SSSS. Silgan has made material substitutions to reduce HAP emissions to below the applicability levels of the MACT standard. Data sheets have been reviewed, approved, and are on file at the HDEM.

**Federal Rule Applicability**

(a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT – Standards of Performance for Metal Coil Surface Coating) are not included in the permit for this Coil Coating Line. Construction of this unit commenced prior to January 5, 1981.

(b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.490, Subpart WW – Standards of Performance for Beverage Can Surface Coating) are not included in the permit for this Coil Coating Line. It is not an “affected facility” and construction of this unit commenced prior to November 26, 1980.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart SSSS are not included in the permit for this Coil Coating Line because the source is able to maintain HAP emissions below the applicability thresholds with the existing federally enforceable conditions in the existing Part 70 permit.

**State Rule Applicability - Entire Source**

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on February 13, 1991. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 7, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

There were no changes or increases of emissions due to this request to limit HAP emissions. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset

There were no increases of VOC, NOx, or HAP emissions due to this request to limit HAP emissions. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

326 IAC 2-6 (Emission Reporting)

Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has potential to emit greater than or equal to 250 tons per year of volatile organic compounds; therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined by 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

326 IAC 6-1-10.1 (Lake County PM10 emission requirements)

Pursuant to 326 IAC 6-1-10.1(Lake County PM10 emission requirements), the PM10 emissions from the Coil Coater shall be limited to 0.007 lbs/MMBtu and 0.290 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

Pursuant to 326 IAC 6-1-10.1(Lake County PM10 emission requirements), the PM10 emissions from the Stacks serving the incinerator shall be limited to 0.007 lbs/MMBtu and 0.310 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

326 IAC 7-4-1.1 (Lake County sulfur dioxide emission limitations)

Pursuant to 326 IAC 7-4-1.1 (Lake County sulfur dioxide emission limitations), the SO2 emissions from the Coil Coating Oven and Incinerator shall be limited to 0.3 lbs/MMBtu as specifically listed in 326 IAC 7-4-1.1(b)(1).

326 IAC 8-1-2 (Compliance methods)

Pursuant to 326 IAC 8-1-2(b) (Compliance methods), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed under the applicable emission limitation contained in this article for any surface coating operation using the compliance methods contained in subsection (a) or section 5 of this rule. Equivalency shall be determined by the following equation:

$E = L/(1 – L/D)$

Where: L = Applicable emission limit from this article in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of seven and thirty-six hundredths (7.36) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

326 IAC 8-2-4 (Coil coating operations)

Pursuant to 326 IAC 8-2-4(b) (Coil coating operations), the VOC emissions from the Coil Coating Line are limited to 2.6 pounds per gallon (excluding water) as listed in 326 IAC 8-2-4(b).

Use of a non-compliant coating requires that compliance be determined according to RACT equivalency emission standards, expressed as pounds of VOC per gallon of coating solids, allowed under the applicable emission limitation in 326 IAC 8-1-2 (Compliance Methods). The equivalency emission limit is 4.02 pounds of VOC per gallon of coating solids as applied.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a) (Applicability), existing facilities as of January 1, 1980, performing organic solvent degreasing operations located in Lake County and located at a source which has potential emissions of 100 tons or greater per year of VOC are subject to the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations).

The two (2) Closed Top Degreasers (one (1) 20 gallon capacity citrus-based, remotely stored and one (1) 55 gallon capacity solvent-based, not remotely stored) are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation).

Pursuant to 326 IAC 8-3-1(b) (Applicability), facilities existing as of July 1, 1990 performing organic solvent degreasing operations in Lake County using cold cleaner degreasers without remote solvent reservoirs are subject to the requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control).

The one (1) Closed Top Degreaser (one (1) 55-gallon capacity solvent-based (XA solvent), not remotely stored) is subject to the requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7-2 (Applicability), coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Lake County shall be subject to the requirements of 326 IAC 8-7.

Pursuant to 326 IAC 8-7-3(3) (Emission limits), Silgan has achieved an alternative overall emission reduction with the application of reasonably available control technology (RACT) that has been determined as reasonably available by the U.S. EPA and IDEM. Pursuant to 326 IAC 8-7-3(1), Silgan has also installed an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%) as an emissions reduction measure.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-6 (Record keeping and reporting requirements) stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of the rule. The seven (7) indoor vertical, fixed-roof storage tanks are subject to the requirements of 326 IAC 8-9-6(b) since they each have capacities less than thirty-nine thousand (39,000) gallons.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5.

As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

For this permit modification request, the following compliance determination and monitoring requirements were necessary to establish that 40 CFR 63, Subpart SSSS (Surface Coating of Metal Coil) which becomes effective on June 10, 2005, does not apply or become applicable.

a) Total input of any one (1) single hazardous air pollutant (HAP) for the Coil Coating Line shall be less than five hundred (500) tons per twelve (12) consecutive month period.

b) Total input of any combination of HAPs for the Coil Coating Line shall be less than one thousand two hundred fifty (1250) tons per twelve (12) consecutive month period.

c) The Fume Incinerator known as Oxidizer 1 shall maintain a minimum overall control efficiency of ninety-eight percent (98%) such that the emissions of any single hazardous air pollutant (HAP) are limited to less than ten (10) tons for any twelve (12) consecutive month period and the total emissions of all hazardous air pollutants (HAPs) are limited to less than twenty-five (25) tons for any twelve (12) consecutive month period.

d) Record keeping of the 12-month rolling totals shall be determined at the end of each month and a quarterly report of the12-month rolling totals shall be submitted within thirty (30) days after the end of the quarter being reported.

These compliance determination, monitoring, record keeping, and reporting requirements are necessary to establish, on a continual basis, that 40 CFR 63, Subpart SSSS does not apply.

**Minor Permit Modification 089-19655-00202** (Pages affected: 1, 3, 4, 29-33,and 44)

The following changes were made to Silgan Containers Corporation Part 70 Permit T089-6900-00202, Section D.1. The necessary changes were also made to the cover page (1) and table of contents (pages 3 and 4). **Bold** indicates the items that were added and ~~strikeouts~~ indicate the items that were removed:

## SECTION D.1 FACILITY OPERATION CONDITIONS

| |
|---|
| Facility Description [326 IAC 2-7-5(15)] One (1) Coil Coating Line, identified as Oven and Oxidizer 1, with a maximum line speed of 600 ft/min and maximum heat input rate of 44 MMBtu/hr and 20 MMBtu/hr, respectively (total combined capacity 64 MMBtu/hr), natural gas-fired only. The application method is roll coating. The VOC emissions from this line are controlled by one (1) fume incinerator which exhausts to stacks, identified as OX 1 and OX 3. This line also includes ten (10) mixing tanks, identified as MT 1 – MT 10, each with a maximum capacity of 290 gallons.<br>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.) |

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Particulate Matter less than 10 microns (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from the Coil Coater shall be limited to 0.007 lbs/MMBtu and 0.290 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

D.1.2 Particulate Matter less than 10 microns (PM10) [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1 (Lake County PM10 emission requirements), the PM10 emissions from the Stacks serving the incinerator shall be limited to 0.007 lbs/MMBtu and 0.310 lbs/hr as specifically listed in 326 IAC 6-1-10.1(d).

D.1.3 Sulfur Dioxide (SO2) emission limitations [326 IAC 7-4-1.1(b)(1)]

Pursuant to 326 IAC 7-4-1.1 (Lake County sulfur dioxide emission limitations), the SO2 emissions from the Coil Coating Oven and Incinerator shall be limited to 0.3 lbs/MMBtu as specifically listed in 326 IAC 7-4-1.1(b)(1).

D.1.4 Volatile Organic Compounds (VOCs) [326 IAC 8-2-4(b)] [326 IAC 8-1-2(b)] [326 IAC 8-7-3(3)]

Pursuant to 326 IAC 8-2-4(b) (Coil coating operations), the VOC emissions from the Coil Coating Line shall be limited to 2.6 pounds per gallon (excluding water) as specifically listed in 326 IAC 8-2-4(b).

Use of a non-compliant coating requires that compliance be determined according to RACT equivalency emission standards, expressed as pounds of VOC per gallon of coating solids, allowed under the applicable emission limitation contained in 326 IAC 8-1-2(b) (Compliance Methods). The equivalency emission limit is 4.02 pounds of VOC per gallon of coating solids as applied.

D.1.5 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties [326 IAC 8-7]

Pursuant to 326 IAC 8-7-2 (Applicability), coating facilities which emit or have the potential to emit a total equal to or greater than ten (10) tons per year of VOCs in Lake County shall be subject to the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties).

**D.1.6 National Emissions Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil [326 IAC 20-1] [40 CFR 63, Subpart SSSS]**

**a) The total input of any one (1) single hazardous air pollutant (HAP) for the Coil Coating Line shall be less than five hundred (500) tons per twelve (12) consecutive month period.**

**b) The total input of any combination of HAPs for the Coil Coating Line shall be less than one thousand two hundred fifty (1250) tons per twelve (12) consecutive month period.**

**c) The Fume Incinerator known as Oxidizer 1 shall maintain a minimum overall control efficiency of ninety-eight percent (98%) such that emissions of any single hazardous air pollutant (HAP) are limited to less than ten (10) tons per twelve (12) consecutive month period and the total emissions of all hazardous air pollutants (HAPs) are limited to less than twenty-five (25) tons per twelve (12) consecutive month period.**

**These limitations will make 40 CFR 63, Subpart SSSS, not applicable.**

~~D.1.6~~ **D.1.7** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

~~D.1.7~~ **D.1.8** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 8-7-3(1)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. Testing shall ~~also~~ be performed at the inlet and outlet of ~~the Incinerator 1~~ **Oxidizer 1** to demonstrate the control and destruction ~~efficiencies~~ **efficiency** necessary to achieve compliance with **Condition D.1.6 and** the RACT equivalency emission limit of 4.02 lbs of VOC/gallon of coating solids as applied. This test shall be repeated at least once every 5 years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

~~D.1.8~~ **D.1.9** Volatile Organic Compounds (VOCs) [326 IAC 8-1-2(b)] [326 IAC 8-7-3(3)]

Compliance with the VOC content and emission limitation contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-2(b) using formulation data supplied by the coating manufacturer.

Compliance with D.1.4 shall be determined using the following equations:

Lbs/VOC per gal of solids = (lbs VOC per gal less water)/(1 – lbs VOC per gal less water / coating density (lbs/gal) as applied)

The emission limit in 326 IAC 8-2-4 is 2.6 lbs VOC per gal less water. The standard coating density used in formulas in the can industry is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of Lbs VOC/gal solids is:

lbs/VOC per gal of solids = 2.6/(1 – 2.6/7.36) = 4.02 lbs VOC/ gal solids

The emissions from the Coil Coater with Oven are controlled by one (1) fume incinerator. The overall rated control efficiency is 98%. This control efficiency is used to find the compliant limit of a coating's VOC content per gallon of coating solids.

(1-Overall Control Efficiency) X = emission limit of 4.02 lbs VOC per gal of solids (as applied)

where X = compliant coating limit in lbs VOC per gal of solids

(1 – 0.98) X = 4.02

X = 201 lbs VOC per gal of coating solids (as applied)

*Coating Density (as applied)* = Coating Density (as supplied) + (Dilution Solvent Density X Dilution Ratio) / (1+ Dilution Ratio)

*lbs solids per gal of coating (as applied)* = Coating Density (as supplied) * [Weight % Solids (as supplied) / 100] / (1 + Dilution Ratio)

*Weight % Solids in coating (as applied)* = lbs solids per gal coating / Coating Density (as applied) X 100

*Weight % Solvent in coating (as applied)* = 100 – Weight % Solids (as applied)

*Volume % Solids in Coating (as applied)* = Vol % Solids (as supplied) / (1 + Dilution Ratio)

*lbs VOC/gal less water (as applied)* = Density (as applied) X [Weight % Solvent (as applied) / 100]

*lbs VOC/gal solids (as applied)* = lbs VOC/gal less water (as applied) / [Volume % Solids (as applied) / 100]

The lbs VOC per gal of solids "as applied" is then compared to the limit for coil coating, considering the overall control efficiency, 201 lbs VOC per gal of coating solids (as applied). If lbs VOC per gal of solids "as applied" is less than this value, the coating "as applied" is compliant. If it is larger than this value, the coating "as applied" is not compliant and should not be used.

~~D.1.9~~ **D.1.10** VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each quarter based on the daily weighted average of all coatings applied for the three (3) month reporting period.

~~D.1.10~~ **D.1.11** Fume Incinerator [326 IAC 2-7-6] [326 IAC 8-7-3(1)]

Pursuant to 326 IAC 2-7-6, the fume incinerator used for VOC control shall operate at all times when the Coil Coating Line is in operation. When operating, the fume incinerator shall maintain a minimum operating temperature of 1,400°F or a temperature determined in the compliance test required by Condition ~~D.1.7~~ **D.1.8** to maintain a minimum 98% destruction of the volatile organic compound (VOC) captured.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

~~D.1.11~~ **D.1.12** Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the fume incinerator for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

~~D.1.12~~ **D.1.13** Visible Emissions Notations

(a) Daily visible emission notations of the incinerator stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

~~D.1.13~~ **D.1.14** Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.4.

Silgan Containers Manufacturing Corporation shall be required to document compliance with the applicable (VOC) emission limitation based on a daily weighted average of all coatings applied. These records shall include the following:

(1) Date of use

(2) Coating identification (inside and outside material)

(3) Process operating rate (GALS/MLFT for each coating)

(4) Coating usage (application rate in weight /area, total gallons of coating used, total gallons of solids used)

(5) Coating information (as supplied and as applied of the coating density, % by weight & volume of organic volatiles, % by weight & volume of solids, lbs-VOC/gal less water as applied, lbs-VOC/gal of solids, dilution solvent used, and the dilution solvent ratio)

(6) Control equipment efficiency

(7) VOC emissions calculations (total lbs-VOC before controls and total lbs-VOC after controls)

(8) VOC emissions allowable

Sample calculations must also be included for the above items.

(b) To document compliance with Condition D.1.4, the Permittee shall be required to keep monthly records of all cleaning solvents used and the weight of any solvents reclaimed, manifested, and sent off-site for disposal and recovery.

(c) To document compliance with Condition D.1.3, the Permittee shall be required to record and maintain the monthly fuel usage for the Coil Coating Line. These records shall be submitted upon request by either HDEM or IDEM.

**(d) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. These records shall be complete and sufficient to establish compliance with the twelve (12) month rolling total single and combination HAP emission limits established in Condition D.1.6. These records shall include the following:**

**(1) The HAP content of each coating as applied;**

**(2) The amount of each coating used;**

**(3) The overall control efficiency of the fume incinerator (Oxidizer 1) as established during the most recent compliance stack test; and**

**(4) The 12-month rolling total of the input of each individual hazardous air pollutant and total of hazardous air pollutants.**

~~(d)~~ **(e)** That the Permittee be required to submit to the Department a formal request to use any new coatings not previously applied for prior to use. This request must be submitted at least seven (7) days in advance of use. The Permittee shall ensure compliance with 326 IAC 8-2-4 by performing those calculations listed in Condition ~~D.1.8~~ **D.1.9** and providing the Department with an MSDS.

~~(e)~~ **(f)** That visible stack observations be made on a daily basis as either "normal" or "above normal". Corrective actions must be taken upon observation of an "above normal" stack condition. The source shall be required to record this information in a log. This log shall be submitted upon request by HDEM or IDEM.

~~(f)~~ **(g)** All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

The following condition has been deleted because it is a duplication of the above condition D.1.14(e).

~~D.1.14 Request for New Coatings~~

~~That the Permittee be required to submit to the Department a formal request to use any new coatings not previously applied for prior to use. This request must be submitted at least seven (7) days in advance of use. The Permittee shall ensure compliance with 326 IAC 8-2-4 by performing those calculations listed in Condition D.1.8 and providing the Department with an MSDS.~~

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4, **D.1.6,** and ~~D.1.13~~ **D.1.14** shall be submitted to the address(es) listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The following reporting form has been added to conform with the above language in Condition D.1.15, Reporting Requirements.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
## OFFICE OF AIR QUALITY
## COMPLIANCE DATA SECTION

**and**

## HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## Hazardous Air Pollutants (HAPs) Compliance Monitoring Form

Source Name: **Silgan Containers Manufacturing Corporation**
Source Address: 2501 – 165th Street, Hammond, Indiana 46320
Part 70 Permit No.: T089-6900-00202
Facility: Coil Coating Line and Oxidizer
Limit: **Total input of any single HAP less than 500 tons per twelve (12) consecutive month period and total input of any combination of HAPs less than 1250 tons per twelve (12) consecutive month period to be determined each month as a twelve (12) month rolling total. The Oxidizer shall have a minimum control efficiency of 98%.**

**Reporting Quarter: _____ Year: _____**

| Month | Single HAP Input This Month | Single HAP Input Previous 11 Months | Single HAP Input 12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

**Control Efficiency determined during most recent stack test_____ (98% or greater).**

| Month | Total HAPs Input This Month | Total HAPs Input Previous 11 Months | Total HAPs Input 12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

This form is optional. An equivalent form subject to approval by IDEM-OAQ or HDEM may be used.

_ No deviation occurred in this month.

_ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**Conclusion**

The operation of this Metal Coil Coating Line shall be subject to the conditions of the attached proposed Minor Permit Modification **089-19655-00202** (Part 70 permit revised pages 1, 3, 4, 29-33, and 44).

Silgan Containers, Hammond, IN

Plant Number: 564
3/9/2005 - 3/9/2005

# *MACT- Material Substitution Scenarios*

| | | Evolved | | | | Evolved |
|---|---|---|---|---|---|---|
| **Material** | **Usage** | **Total** | **Xylene** | **Subsitute Material** | **Usage** | **Total** | **Xylene** |
| 14S47WA | 6,971 | 6,613 | 5,491 | | 6,971 | 6,613 | 5,491 |
| 14S48MA | 14,105 | 20,492 | 16,906 | | 14,105 | 20,492 | 16,906 |
| 2521401 | 17,318 | 3,044 | 0 | | 17,318 | 3,044 | 0 |
| 3740002 | 9,826 | 10,674 | 8,649 | | 9,826 | 10,674 | 8,649 |
| 3755088B | 52 | 0 | 0 | | 52 | 0 | 0 |
| 4623105 | 9,571 | 22,558 | 16,829 | | 9,571 | 22,558 | 16,829 |
| 50/50 BLEND | 13,677 | 48,622 | 0 | | 13,677 | 48,622 | 0 |
| 650C136 | 13,883 | 38,101 | 30,742 | | 13,883 | 38,101 | 30,742 |
| 86X122A | 6,586 | 20,135 | 15,087 | | 6,586 | 20,135 | 15,087 |
| 9372019 | 107,573 | 277,385 | 201,894 | 9372040 | 128,472 | 15,706 | 15,706 |
| 9372025 | 143,832 | 385,412 | 281,468 | 9372040 | 157,820 | 19,294 | 19,294 |
| 9372535 | 110 | 282 | 205 | 9372040 | 129 | 16 | 16 |
| 9840901 | 11,180 | 30,302 | 1,026 | | 11,180 | 30,302 | 1,026 |
| 9844501 | 304,483 | 1,083,010 | 808,475 | 9844518 | 369,088 | 205,010 | 35,654 |
| 9844518 | 3,034 | 1,685 | 293 | 9844518 | 3,034 | 1,685 | 293 |
| BUTYL | 874 | 0 | 0 | | 874 | 0 | 0 |
| CYCLOHEXANONE | 821 | 0 | 0 | | 821 | 0 | 0 |
| DBE | 5,078 | 0 | 0 | | 5,078 | 0 | 0 |
| DBE CYCLOHEXANON | 659 | 0 | 0 | | 659 | 0 | 0 |
| DIBK | 4,458 | 0 | 0 | | 4,458 | 0 | 0 |
| XA SOLVENT | 297,809 | 1,440,204 | 1,152,163 | | 148,904 | 720,102 | 576,081 |
| | **971,900** | **3,388,519** | **2,539,227** | | **922,506** | **1,162,352** | **741,773** |
| ***Emitted @ 98% OCE*** | | ***33.89*** | ***25.39*** | | | ***11.62*** | ***7.42*** |

The above estimate is based on the following - Existing material usage based on 2004 data is presented above on the left-hand side showing total HAP's evolved. The shaded materials are the ones that have been replaced with low or xylene-free materials. The right-hand side shows the resulting emissions based on use of the substituted materials. Both estimates are shown at 98% overall control efficiency.

*Please note that during 2004 we had achieved greater than 98% OCE based on oxidizer testing done on 2-4-2004.

# Indiana Department of Environmental Management
# Office of Air Quality

**and**

## Hammond Department of Environmental Management
## -Air Pollution Control Division-

Addendum to the Technical Support Document for a
Minor Permit Modification to a Part 70 Permit

| | |
|---|---|
| Source Name: | Silgan Containers Manufacturing Corporation |
| Source Address: | 2501 – 165th Street, Hammond, Indiana 46320 |
| County: | Lake |
| SIC Code: | 3479 - Metal Coil Coating |
| Minor Permit Modification No.: | 089-19655 |
| Operation Permit No.: | T089-6900-00202 |
| Permit Reviewer: | Ronald Holder |

On April 30, 2005, the Hammond Department of Environmental Management (HDEM) had a notice published in the Hammond Times, Hammond, Indiana, stating that Silgan Containers Manufacturing Corporation (Silgan) had applied for a minor modification of their Part 70 Permit to operate a metal coil coating operation. The notice also stated that HDEM proposed to issue a minor permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comment on whether or not this permit should be issued as proposed.

Upon further review, the HDEM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

On page 33 of 46, in Condition D.1.14, section (d)(3), the name of the fume incinerator **(Oxidizer 1)** has been added as follows to be consistent with the wording in the Technical Support Document:

(d) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. These records shall be complete and sufficient to establish compliance with the twelve (12) month rolling total single and combination HAP emission limits established in Condition D.1.6. These records shall include the following:

(1) The HAP content of each coating as applied;

(2) The amount of each coating used;

(3) The overall control efficiency of the fume incinerator **(Oxidizer 1)** as established during the most recent compliance stack test; and

(4) The 12-month rolling total of the input of each individual hazardous air pollutant and total of hazardous air pollutants.